

U.S. DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DISTRICT

JAMES G. ABOUREZK,
ROXANNE DUNBAR-ORTIZ, and
JANE FONDA,

Plaintiffs,

v.

PROBUSH.COM, INC., a Pennsylvania corporation,
MICHAEL MARINO, an individual, and
BENJAMIN MARINO, an individual,

Defendants.

Civil Action No. 03-4146

**PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

COMES NOW the Plaintiffs, by and through their attorney of record, with this Plaintiffs' Motion for Partial Summary Judgment.

Pursuant to Fed. R. of Civ. Pro. 56(d), the Plaintiffs move this Court for a ruling of partial summary judgment on the issue of the Defendants' liability in this matter in favor of the Plaintiffs.

Dated this 5th day of July, 2005.

Todd D. Epp Law Office, PLLC

/s/ Todd D. Epp

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing pleading was filed via the District of South Dakota's CM/ECF system and sent via email on the 5th day of July 2005 to:

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